

From: [Jennifer Allim](#)
To: [Carlisle, Marie L.](#)
Subject: Deposition Dates
Date: Friday, August 19, 2016 7:43:10 PM

Hi Marie:

I received notice from Mrs. DiGiulian, Adv. Pro. No. 10-04728, that she will travel to NYC for her deposition to occur on Tuesday, November 15th.

Thanks so much.

Best,

Jennifer

Jennifer Allim
Chaitman LLP
465 Park Avenue
New York, New York 10022
jallim@chaitmanllp.com
Office: (888) 759-1114 ext. 7
Fax: (888) 759-1114

From: Jennifer Allim
Sent: Friday, August 19, 2016 3:24 PM
To: 'Carlisle, Marie L.' <mcarlisle@bakerlaw.com>
Subject: RE: SERVICE OF COURT DOCUMENTS(S); ADV. PRO. NO. 10-05079

Hi Marie:

I previously sent an email indicating that Dusek, 10-04644, will be available from the first week of November on. I will touch base with the remaining clients this week.

There's been a slight change in schedule for Placon2, 10-04768. Can we change the date from October 11th to October 12th?

Additionally, our client, Robert Whitman, 10-04614, has brought to our attention, the fact that he is involved in three proceedings for which he anticipates there will be three depositions, among other things. We think that it would be most efficient for all parties to consolidate these matters. The proceedings in which he is involved are:

1. Adv. Pro. No. 10-04614, Picard v. R. Whitman
2. Adv. Pro. No. 10-05196, Picard v. Irene Whitman 1990 Trust, et al.
3. Adv. Pro. No. 10-04979, Picard v. James M. New Trust, et al.

Please let me know your thoughts.

Best,

Jennifer

Jennifer Allim
Chaitman LLP
465 Park Avenue
New York, New York 10022
jallim@chaitmanllp.com
Office: (888) 759-1114 ext. 7
Fax: (888) 759-1114

From: Carlisle, Marie L. [<mailto:mcarlisle@bakerlaw.com>]
Sent: Thursday, August 18, 2016 5:34 PM
To: Jennifer Allim <jallim@chaitmanllp.com>
Cc: Helen Chaitman <hchaitman@chaitmanllp.com>; Smith, Rachel M. <rsmith@bakerlaw.com>
Subject: RE: SERVICE OF COURT DOCUMENTS(S); ADV. PRO. NO. 10-05079

Good afternoon Jennifer.

I wanted to follow up on your email below to see if you have been able to obtain proposed deposition dates for the six proceedings listed below. As soon as I receive deposition dates, I will circulate proposed amended case management plans for review and approval.

Thanks,

Marie

From: Jennifer Allim [<mailto:jallim@chaitmanllp.com>]
Sent: Tuesday, August 2, 2016 1:36 PM
To: Carlisle, Marie L.
Cc: Helen Chaitman; Smith, Rachel M.; Sinclair, Jordan
Subject: RE: SERVICE OF COURT DOCUMENTS(S); ADV. PRO. NO. 10-05079

Hi Marie:

In addition to the deposition dates I sent to you on Friday, for Adv. Pro. Nos.: 10-04768, Placon2; 10-04428, Meisels; 10-05079, Goodman; and 10-04614, Whitman, I have conferred with Mr. Horowitz, Adv. Pro. No. 10-04748 and he is available on Friday, October 21st in NYC.

Please extend discovery for the remaining proceedings:

APN 10-04728- Picard v. DiGiulian
2016

August 11,

APN 10-04541- Picard v. Perlman 2016	August 15,
APN 10-04818- Picard v. Harwood 2016	August 18,
APN 10-04914- Picard v. Gordon 2016	August 29,
APN 10-04826- Boyer Palmer 2016	September 1,
APN 10-04644- Russell Dusek 2016	September 6,

I will continue to send you proposed dates for depositions in all matters as received.

Thanks so much.
Jennifer

Jennifer Allim
Chaitman LLP
465 Park Avenue
New York, New York 10022
jallim@chaitmanllp.com
Office: (888) 759-1114 ext. 7
Fax: (888) 759-1114

From: Carlisle, Marie L. [<mailto:mcarlisle@bakerlaw.com>]
Sent: Tuesday, August 02, 2016 2:25 PM
To: Jennifer Allim <jallim@chaitmanllp.com>
Cc: Helen Chaitman <hchaitman@chaitmanllp.com>; Smith, Rachel M. <rsmith@bakerlaw.com>;
Sinclair, Jordan <jsinclair@bakerlaw.com>
Subject: RE: SERVICE OF COURT DOCUMENTS(S); ADV. PRO. NO. 10-05079

Good afternoon Jennifer.

I wanted to follow up on your email to see if you have been able to determine any additional deposition dates for the top three adversary proceedings listed below. I am out of town, but am able to check email. If you are not able to obtain dates, but anticipate that we will need to extend discovery to accommodate Defendants' depositions, please let me know. We can enter into an informal agreement to extend, with the date to be determined and a case management notice prepared once we have the deposition dates.

Thanks,

Marie

Sent via the Samsung Galaxy S® 6, an AT&T 4G LTE smartphone

----- Original message -----

From: Jennifer Allim <jallim@chaitmanllp.com>

Date: 7/29/16 10:18 PM (GMT+01:00)

To: "Carlisle, Marie L." <mcarlisle@bakerlaw.com>

Cc: Helen Chaitman <hchaitman@chaitmanllp.com>

Subject: RE: SERVICE OF COURT DOCUMENTS(S); ADV. PRO. NO. 10-05079

Hi Marie:

Please see the attached for the proposed dates that I was able to obtain so far. As indicated in the attachment, I am working on coordinating with the remaining clients for whom you have requested dates.

Jennifer Allim
Chaitman LLP
465 Park Avenue
New York, New York 10022
jallim@chaitmanllp.com
Office: (888) 759-1114 ext. 7
Fax: (888) 759-1114

From: Carlisle, Marie L. [<mailto:mcarlisle@bakerlaw.com>]

Sent: Friday, July 29, 2016 4:08 PM

To: Jennifer Allim <jallim@chaitmanllp.com>

Cc: Helen Chaitman <hchaitman@chaitmanllp.com>; Smith, Rachel M. <rsmith@bakerlaw.com>;
Hunt, Dean D. <dhunt@bakerlaw.com>

Subject: RE: SERVICE OF COURT DOCUMENTS(S); ADV. PRO. NO. 10-05079

Jennifer,

As I mentioned the other day, I will be out of the office beginning on Monday, with limited availability after Monday evening. Fact discovery will be closing in the next few weeks in the following adversary proceedings for which I've asked you to supplement discovery and provide deposition dates.

APN 10-04728 DiGiulian	08/11/16
APN 10-04748 Horowitz	08/12/16
APN 10-04541 Kenneth Perlman	08/15/16
APN 10-04768 Placon2	08/15/16

I am relying on your representation below that you are working on obtaining new deposition dates for these and other cases and that you will have them to me by Monday. If we have the new deposition dates by Monday, I can have my office turn around new case management plans next week for approval and filing. If you are unable to get the dates to me by Monday, and can assure me

that you will provide new dates by the time I return on August 10th, then we will agree to informally extend fact discovery deadlines in these cases and, upon my return, can assess the status of discovery and amend case management plans to accommodate your clients' new deposition dates.

Please let me know if you are in agreement with this approach. I am available this afternoon if you would prefer to discuss.

Thanks,

Marie

From: Jennifer Allim [<mailto:jallim@chaitmanllp.com>]
Sent: Thursday, July 28, 2016 5:36 PM
To: Carlisle, Marie L.
Cc: Helen Chaitman
Subject: FW: SERVICE OF COURT DOCUMENTS(S); ADV. PRO. NO. 10-05079

Hi Marie:

Amended responses for Adv. Pro. No. 10-05079, Picard v. Goodman have been submitted.

I am working on obtaining client availability for depositions and should get them to you by Monday, as discussed.

Best,

Jennifer

Jennifer Allim
Chaitman LLP
465 Park Avenue
New York, New York 10022
jallim@chaitmanllp.com
Office: (888) 759-1114 ext. 7
Fax: (888) 759-1114

From: Sarah Howell
Sent: Thursday, July 28, 2016 6:30 PM
To: dsheehan@bakerlaw.com; ncremona@bakerlaw.com; mcarlisle@bakerlaw.com; dhunt@bakerlaw.com
Cc: Helen Chaitman <hchaitman@chaitmanllp.com>; Jennifer Allim <jallim@chaitmanllp.com>
Subject: SERVICE OF COURT DOCUMENTS(S); ADV. PRO. NO. 10-05079

NAME OF COURT:	U.S. Bankruptcy Court Southern District of New York
----------------	---

CASE NO(S):	10-05079
PLAINTIFF(S)	Irving H. Picard
DEFENDANT(S):	ESTATE OF JAMES M. GOODMAN; and AUDREY GOODMAN, individually, and in her capacity as Personal Representative of the Estate of James M. Goodman
DOCUMENT BEING SERVED:	<ul style="list-style-type: none">- Amended Responses and Objections of Audrey Goodman to Trustee's First Request for Production of Documents;- Amended Responses and Objections of Audrey Goodman to Trustee's First Set of Interrogatories with Verificaiton;- Amended Responses and Objections of Audrey Goodman as Personal Representaitve of the Estate of James M. Goodman to Trustee's First Set of Interrogatories with Verificaiton; and- Amended Responses and Objections of Audrey Goodman as Personal Representaitve of the Estate of James M. Goodman to Trustee's First Request for Production of Documents
SENDER'S NAME:	Helen Davis Chaitman, Esq. / Sarah Howell
SENDER'S TELEPHONE NO.:	888-759-1114

Sarah Howell, Paralegal
Chaitman LLP
465 Park Avenue
New York, New York 10022
showell@chaitmanllp.com
Office: (888) 759-1114, Ext. 6

This email is intended only for the use of the party to which it is addressed and may contain information that is privileged, confidential, or protected by law. If you are not the intended recipient you are hereby notified that any dissemination, copying or distribution of this email or its contents is strictly prohibited. If you have received this message in error, please notify us immediately by replying to the message and deleting it from your computer.

Any tax advice in this email is for information purposes only. The content of this email is limited to the matters specifically addressed herein and may not contain a full description of all relevant facts or a complete analysis of all relevant issues or authorities.

Internet communications are not assured to be secure or clear of inaccuracies as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. Therefore, we do not accept responsibility for any errors or omissions that are present in this email, or any attachment, that have arisen as a result of e-mail transmission.